## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

DeJUAN CARTER,

Plaintiff,

v. CASE NO: 2:15-cv 11370

HON: ROBERT H. CLELAND MAG. MONA K. MAJZOUB

REDFORD TOWNSHIP and J. HAAS, in his individual and official capacities,

Defendants.

CHRISTOPHER TRAINOR & ASSOCIATES CUMMINGS, McCLOREY, DAVIS &

CHRISTOPHER J. TRAINOR (P42449) ACHO, P.L.C.

AMY J. DEROUIN (P70514)

JEFFREY R. CLARK (P33074)

SHAWN C. CABOT (P64021)
Attorneys for Plaintiff
9750 Highland Road
White Lake, MI 48386

33900 Schoolcraft Road
Livonia, MI 48150
734-261-2400
734-261-4510-fax

(248) 886-8650 | jclark@cmda-law.com

shawn.cabot@cjtrainor.com

## STIPULATED PROTECTIVE ORDER FOR INDEPENDENT MEDICAL EXAMINATION OF PLAINTIFF

**UPON STIPULATION** of the parties and the Court being otherwise fully advised in the premises;

IT IS HEREBY ORDERED that Plaintiff shall appear for an Independent Medical Examination on a mutually convenient date, time, and place to be determined by Counsel for the parties; and which can take place after the courtimposed discovery cut-off date.

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IT IS FURTHER ORDERED that Defendants' Independent Medical

Examiner shall not perform any invasive procedures without the prior consent of

Plaintiff's Counsel or Order of the Court.

IT IS FURTHER ORDERED that Plaintiff shall be permitted to have his

attorney or other third party of Plaintiff's choosing present.

IT IS FURTHER ORDERED that Plaintiff's Counsel shall be provided a

copy of any report(s) generated as a result of Plaintiff's Independent Medical

Examination.

IT IS FURTHER ORDERED that Plaintiff's Counsel be permitted to take

the discovery deposition of Defendants' Independent Medical Examiner prior to

the examiner's trial testimony.

IT SO ORDERED.

Dated: February 17, 2016

s/Robert H. Cleland

HONORABLE ROBERT H. CLELAND

We hereby stipulate to the above Order:

s/Shawn C. Cabot

Shawn C. Cabot (P64021)

Attorney for Plaintiff

s/Jeffrey R. Clark w-consent

Jeffrey R. Clark (P33074)

Attorney for Defendants